

***NATURAL RESOURCES DEFENSE COUNCIL  
COALITION FOR CLEAN AIR  
COMMUNITY OUTREACH AND EDUCATION PROGRAM  
SOUTHERN CALIFORNIA ENVIRONMENTAL HEALTH SCIENCES CENTER  
KECK SCHOOL OF MEDICINE, USC  
SAN PEDRO & PENINSULA HOMEOWNERS COALITION  
ENVIRONMENTAL HEALTH COALITION  
COALITION FOR A SAFE ENVIRONMENT  
CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE  
WEST OAKLAND ENVIRONMENTAL INDICATOR PROJECT  
PACIFIC INSTITUTE  
FRESNO METROPOLITAN MINISTRY***

March 17, 2006

Sunne Wright McPeak, Secretary  
California Business, Transportation  
& Housing Agency (BTH)  
980 9th Street, Suite 2450  
Sacramento, CA 95814

Cindy Tuck, Assistant Secretary for Policy  
California Environmental  
Protection Agency  
1001 I Street  
Sacramento, CA 95814

**Re: February 17 Draft Framework for Action**

Dear Secretary McPeak and Assistant Secretary Tuck:

In these comments, the undersigned members of the Integrating Work Group ("TWG") offer an initial response to new sections and additions and changes in the February 17 Draft Framework for Action. We also address some of the lingering major concerns we have with the process and the Framework that we feel must be addressed before the Plan moves forward. Many of the additions to the Framework show some progress in attempting to address concerns we have previously submitted. In particular, the new section on "accountability" can be a step toward developing a mechanism that gives substance to the desire for "simultaneous and continuous" progress on infrastructure and public health goals, if it is further defined as we comment below. We look forward to continued attention to this section and the practical details of this section.

We thank the administration staff for their time and effort on this draft, and for their continuing solicitation of our comments. In particular, we would like to thank Assistant Secretary Tuck for her considerable attention to our issues and work towards addressing those issues.

Nevertheless, a great many of our previous comments remain outstanding and require a response, despite our having participated extensively and in good faith in the process and having provided such comments repeatedly. We refer you, once again, to the lengthy comments we have submitted at previous stages in the process, and ask that those previous comments continue to be considered as this effort continues to develop and evolve. As we understand it, one of the goals of this process is to integrate and fully address the concerns of the affected communities; that is why all of the undersigned have actively participated in the IWG process.

Yet to be addressed are serious fundamental concerns that must be tackled in order for continued development of a Goods Movement Action Plan to be productive. These include a need to prepare:

- **A comprehensive analysis of the role of goods movement in the economy, job creation/loss, and job quality, which analysis must include a full accounting and balancing of the costs of expanding goods movement, in terms of health, environmental and infrastructure costs, quality of life and wear and tear to our roads.** We have repeatedly mentioned the paper published by Jon Haveman of the Public Policy Institute of California (PPIC) explaining why unlimited expansion of the goods movement system *may* not be beneficial for Californians. In particular, he explains that we act as a distribution center for the rest of the country and subsidize their trade through our health, environmental, and infrastructure costs, wear and tear on our roads and other impacts on quality of life. *We again request that the Administration work with the PPIC to prepare a study of the costs vs. benefits before we move on further.* We believe that responsible governance requires a hard look at this issue. Please see our letter dated January 10 for a more thorough discussion of this issue;
- **A stronger system-wide analysis of the needs of each corridor, including a determination of what broad approaches would shape the system toward a more sustainable one,** rather than the current approach of listing projects before they are even considered against criteria established by the IWG (we discuss this issue further below);
- **Identification of goals and strategies for addressing community impacts, workforce development, security concerns, and environmental justice concerns.** While we have had repeated discussions, subcommittees and community meetings on the issue of community impacts, there has been no progress on addressing this issue. *We again request that studies of community*

***impacts, such as noise, aesthetics, light and glare be prepared by the agencies and that a plan to fully address these issues be developed.*** Similarly, environmental justice issues are not being addressed in a meaningful way in the Framework. There is no mechanism yet in place to ensure that impacts in the most affected areas are addressed first. Similarly, there is no mechanism in place to ensure that disproportionately impacted areas don't become more impacted from infrastructure expansion.

Below are more specific comments targeted at the various sections of the Draft Framework.

## **I. SECTIONS I and II—Executive Summary and Introduction**

We appreciate the agencies' efforts to add a discussion of health impacts, environmental and community concerns to the executive summary. We have long asked for this section to integrate a discussion of the costs, as well as the benefits, of goods movement expansion, so that the document presents a balanced discussion. In particular, the language on I-1 (and the same language on II-1) and the addition of sections on public health, air quality goals, the ARB ERP and community impact mitigation on pages II-2 to II-4 is helpful to giving the reader, the public and the Administration an idea of the costs of expansion. This also helps to eliminate the false implication to which we objected in our last letter that the only way for the state to improve the environmental, public health, and community conditions along trade corridors and by ports and railyards is by expanding that system. ***Nevertheless, we believe that more specific information on health costs, in terms of dollars, other health impacts and costs still is needed. In particular, we reiterate our point above that a full balancing of benefits and costs must be done before we move further with this process, and that analysis should be spelled out in the Framework.***

We also appreciate the identification of the ERP as a "key part of the Goods Movement Action Plan." Our concern has been that the ERP must not be marginalized, and must instead be an integral part of the larger Goods Movement Action Plan. Nevertheless, we are still extremely concerned that the agencies plan to move forward with a final Goods Movement Plan in June related to infrastructure expansion, while the ERP will not be finalized, according to ARB, until 2007 or 2008. ***As we have stated from the beginning of this process, an enforceable plan to reach clean air goals must be finalized and in place before expansion projects move forward.*** It is simply irresponsible for our state to move in a direction that commits us to expansion for the next few decades without first knowing that we have a plan in place that will ensure that we do not compromise our health and reaching attainment with state and federal clean air standards.

Finally, we appreciate the placeholders in the Framework regarding water quality and hazardous sites which must be completed.

## II. SECTION III—Framework for Action

### A. Principles for Implementation

For us to fully evaluate the current draft of the principles, it would be helpful for the agencies to disseminate a redlined version (even if it is in PDF), which makes clear what changes were made. Otherwise, we will continually have to meticulously compare prior drafts and our prior comments, which we have done in the past, but which has become increasingly difficult and onerous to accomplish. We understand that not releasing documents in Word (and presumably not in redlined version) is a BTH policy, but we do not understand its necessity or purpose. This issue can easily be overcome by the agencies creating a redlined word version and then converting that redlined version to a PDF. The comments below are initial comments on the current draft.

#### Principle 4:

First, we appreciate the aim to fully integrate mitigation (page III-3, point 4). We also appreciate the addition of the principle in number 4 that the total cost of a project should include the cost of mitigation. *However, to truly realize the goal of “simultaneous and continuous” improvement, the sentence must be changed as follows: “The total cost of a good-movement related infrastructure project MUST include the cost of [delete “required”] project-specific mitigation AND THE COMBINED COST MUST BE FUNDED AS THE COST OF THE PROJECT.”* We ask that you delete “required,” as mitigation often goes beyond what is required through a CEQA process or otherwise and appropriately so. Moreover, in order to achieve the goals set out by the Administration (including an 85% reduction in PM emissions and attainment with clean air standards); the impacts of new projects will have to be fully mitigated.

We also remain troubled by the part of principle 4 that reads “efforts should be made to mitigate the public health/environmental and community impacts at the least cost.” A more appropriate “guiding principle” for the IWG and this process is that *the most effective mitigation* measures be adopted. We are concerned that including any discussion in the principles of “least cost” or “cost-effectiveness” will narrow the range of measures considered and selected by the agencies in dealing with this health crisis. As we have said many times before, because the devastating effects of goods movement have been uncontrolled for so long, we are no longer in a position where we can pick and choose among viable options for mitigation.

#### Principle 6:

We appreciate the clarification that “acceleration” “does not mean weakening environmental review for infrastructure actions. Nevertheless, as we have commented before, we remain concerned that this principle of “acceleration” is in the Plan before the cost/benefit analysis, described above, has been prepared and considered.

Principle 7:

We, once again, raise our serious concern over the sentence in principle 7 that implies that expanding freeways “may also reduce emissions.” This cannot be part of guiding principles for this process. If there are studies that the agencies are relying on to make these assertions, they should have been cited in the ERP and peer-reviewed and subjected to public comment and scrutiny. As we have repeatedly stated, while reducing congestion may reduce idling and emissions in the short term, in the long term the tripling of traffic will merely fill up those extra lanes, causing more congestion in the future. History has repeatedly shown this to be true with California freeways. More importantly – more capacity means more trucks and greater emissions overall than if a freeway were not expanded in the first place.

Principle 8:

As we have raised before, it is important that land use guidance and principles be integrated more fully into the plan. In particular, we ask that compliance with ARB’s Land Use Guidance be a prerequisite to any infrastructure project being incorporated into the Plan.

Principle 9:

The principle calling for performance metrics should be deleted (page III-4 pt 9). As we have suggested before, metrics may be of some use to track, but as written, they certainly don’t “provide a comprehensive means” to do anything. Investment in infrastructure should contribute to achieving goals, and criteria should be used to determine the relative significance of this contribution. The measurement of progress against goals provides the ultimate means of evaluation.

Principle 14:

Please refer to our previous letters calling for the deletion of this principle. In addition, singling out the delivery of the state’s energy stocks as a principle is incongruous, at best, in a section devoted to the integration of the corridors of the system (page III-5 pt 14). Phase I may have been the appropriate place to discuss the many important goods being moved by the system.

Principle 15:

We agree that we should pursue “the most innovative, effective...technologies available,” and in that spirit ask that “commercially proven” be omitted (page III-5 pt 15). We have repeatedly asked for the deletion of this qualifier in past comment letters. Some of the most promising technologies, including the SAFE technology presented at our last IWG meeting, utilize existing and proven technologies, but have not yet been packaged in such

a way as to meet a “commercially proven” criterion. In addition, as we have noted in the past, we are dealing with an industry that seldom has taken the responsibility to mitigate the impacts it creates. Accordingly, adding a “commercially proven” qualifier unfairly rewards that industry for its lack of responsible action.

## **B. Criteria, Metrics and Benchmarks**

### **Infrastructure Criteria:**

First, we cannot understand why the criteria for infrastructure projects still does not incorporate a criterion that the most environmentally sound and least polluting projects be selected. We were assured by BTH Undersecretary Barry Sedlick at one of the IWG meetings that this would be a criterion and we have repeatedly commented on this. Indeed, one of the principles states that the Plan will “advance actions with highest rates of return—both in terms of investment and public health and environmental improvement.” It is impossible to realize this principle unless one of the criteria for selecting infrastructure projects relates to the relative environmental performance of that project.

Indeed, it is neither useful nor appropriate to segregate environmental, community, and security considerations into sets of criteria for “mitigation actions”, apart from criteria for infrastructure projects (page III-9). While these “mitigation actions” may merit criteria so as to enable the comparison among mitigation choices, the criteria for infrastructure projects must incorporate environmental, community, and security impacts so that the criteria helps to identify the infrastructure projects that have the most benefit and that therefore should be prioritized. In this way, options for achieving infrastructure objectives can be compared to find the environmentally preferable ones.

Relatedly, SCAG distributed at the last Integrated Working Group meeting, a proposal for criteria, and others have suggested the CEQA checklist as potential criteria to be incorporated. The Working Group deserves a discussion of these suggestions, and, if they are not being included in the framework criteria, the rationale for this.

Second, we again reiterate our concern that congestion reduction is presented here as a strategy to reduce air pollution without acknowledgement of the difficulty in maintaining reduced congestion (page III-8 point d). Air quality gains from congestion reduction are short term, if at all, and this should be stated. The more simplistic notion that congestion reduction through freeway expansion equates to air quality benefit is unacceptable in its implications to the “accountability” mechanism; it would create a potential loophole that would allow freeway expansion even if air quality goals are not being met (as discussed further below). *We once again request that this and all references to the environmental “benefits” of expansion be removed from the Framework.*

#### Public Health and Environmental Mitigation Criteria:

First, the longevity of benefit is as important as the immediacy of reductions (or significant reductions overall for long-term measures) and so should be included in criteria c (page III-9).

Second, we appreciate the agencies' efforts to recast the cost-effectiveness criterion, but we are concerned that it will still lead to the selection of one measure over another when *all feasible measures are needed* to solve our current and future expected goods movement health concerns. We thus ask that that criterion g be deleted. We also, once again, request that "secures authority for implementation where necessary" be deleted. It is unclear what is meant by this criterion and seems to unnecessarily limit public health mitigation.

#### Metrics for Public Health and Environmental Mitigation:

While the agencies have differentiated between "metrics" and "metrics that may provide helpful information", this does not address our concern that metrics not be used at all to replace the clear goals laid out in the Phase I Plan or the Draft ERP. As we have stated many times, we simply do not understand why metrics are needed or included in the plan. The only "metrics" employed should be compliance with (and progress towards) the stated environmental and public health goals. We are extremely concerned, for example, that in 5 or 10 years, the agencies will have not met compliance with the goals, but will say that 1,000 vehicles were retired, and therefore we have achieved success. For all of the reasons we have stated again and again, this is an unacceptable outcome. ***We request that all of the environmental and public health metrics be removed from the Framework; at the very least, those that are identified as undefined "helpful information" must be deleted for the reasons we have made clear in our past comment letters.***

#### Benchmarks:

The dismissal of an ability to set benchmarks for environment, community impacts and security belies the inadequacy of the section on metrics and benchmarks (page III-12-16). ***The whole section on metrics and benchmarks should be deleted and replaced with one aimed at setting "goals" both long-term and interim. These goals would then guide the mechanisms for "accountability" which are being developed.***

### III. Preliminary Candidate Actions.

Most of our key concerns regarding the "preliminary candidate actions" still have not been addressed. Initially, we note that we appreciate the agencies changing the description of these from "recommended actions" to "preliminary candidates" to better reflect the fact that the IWG members have not discussed any of these specific actions in

any meaningful way. Nevertheless, we remain extremely concerned that the specific list of projects (dated August 2005) was predetermined before the IWG process was begun and has remained the same, despite the months of thoughtful discussion and comments by environmental, public health and community members of the IWG (and, in fact, the list only seems to grow each time a new draft is released, with new projects added that have *never* been seen or discussed by the IWG). This leads to critical problems with the process and the Framework.

Most importantly, the Framework remains misleading. Specifically, on page IV-1, the Framework states that “The development of the draft Preliminary Candidate Actions herein relied in part on the expert judgment and multi-stakeholder perspectives of the work group members as well as the insightful public comments received throughout” and that it follows the guiding principles and (as noted elsewhere in the Framework) the criteria established by the IWG. As we have repeatedly noted, however, the principles and criteria still have not yet been developed and do not yet include key fundamental goals of this process, including criteria for infrastructure projects that accounts for relative environmental performance or reduced emissions and other impacts. We certainly have never shared perspectives among the IWG members on particular projects and, as far as we can tell, virtually none of our comments (or those of the public) have been incorporated into this list, as it has not changed throughout the process (except to expand in size). As a result, it appears as though the entire process we have undergone—with respect to the infrastructure portion of the Plan—has been designed to do nothing more than provide a *post hoc* rationalization for actions the agencies already planned to take. We cannot help but think that this is not only inappropriate, but a waste of an incredible opportunity to plan for California’s future.

We have *several times now* suggested what we see as the best solution to this problem: identify needs by corridor, rather than specific projects. As we have explained at length in our past comment letters, by having a list of specific projects that has not changed from the beginning of the process, the process (1) does not allow the incorporation of air quality, public health or community criteria in the selection of projects; (2) does not allow for the incorporation of alternatives to the traditional freeway expansion/rail projects, such as zero emission technologies like SAFE and maglev transit, or other ideas from around the globe; and (3) ensures that the state (as well as local agencies and communities) will lose leverage to have the project change or to incorporate full mitigation. Indeed, at one of the IWG meetings, ARB conceded that it would support projects on the list, even in opposition to air districts and community groups trying to make particular projects more environmentally and health protective. By identifying corridor needs instead, all of these problems are alleviated. We continue to oppose any Plan that incorporates this same list of projects.

We do appreciate some of the changes made by the agencies in response to our comments including the deletion or modification of certain “immediate actions” (which were never seen by the IWG before they were added to the list). For example, this draft removes



“market trading programs” and adds the word “evaluate” to short-sea shipping. Nevertheless, much more discussion is required on all of these and other actions before they are listed in the Framework.

Finally, we repeat our comment that the matrix of No Net Increase Measures from the Port of LA process should be incorporated into the list of actions.

#### IV. SECTION V— Accountability

We are pleased to see this section as an effort to give meaning to the concept of “simultaneous and continuous,” and we look forward to working through the details of the accountability concept. Nevertheless, for the reasons outlined below, this section fails currently to provide a mechanism that applies “simultaneous and continuous improvements” in a meaningful way.

First, we note that the beginning of the chapter restates the “simultaneous and continuous” principle. That principle includes: “Approach *funding* and implementation for infrastructure and mitigation on a simultaneous basis.” Yet, a mechanism for simultaneous funding is not addressed in any manner in this section or the larger Framework. ***Accordingly, as we have raised before, it is our position that the cost to eliminate public health, environmental and community impacts for ongoing expansion projects must be included in the total price for those projects and funded as a single cost.*** Given the tremendous estimated costs of mitigation in the billions for air pollution impacts alone (*see* Report to Mayor Hahn and Councilwoman Hahn by the No Net Increase Task Force at ES-5 (total costs ranging between \$11.6 billion and \$15.7 billion for control measures at the port of Los Angeles *alone* just to keep pollution at current levels); *see also* California ARB, *Draft Emission Reduction Plan for Ports and International Goods Movement in California*, at IV-7 and IV-8 (\$3 to \$6 billion to mitigate environmental costs from 2005 to 2020), there must be a mechanism in place to ensure that adequate funding is consistently available as each infrastructure project goes forward, and that funding must be substantial. We are concerned that, if this is not spelled out in the Framework, then infrastructure projects will be funded and we will be left to scramble and hunt for funding for mitigation. These important costs of expansion cannot be externalized.

Second, as to emissions reductions, this accountability section relies entirely on ARB’s ERP. As a result, that plan must be finalized and adopted *before* the Goods Movement Plan is finalized and put into implementation. Indeed, otherwise, this entire section will have no meaning or effect. Currently, we understand that ARB does not plan to finalize the ERP until 2007 or 2008. If this remains the case, it will be impossible to achieve “simultaneous and continuous” improvement, as the plan for environmental and public health improvement will not be adopted or finalized until years after the GMAP. In addition, we have many significant concerns with the ERP, which were outlined in our

letter to you dated February 22. ***These concerns with the ERP and its adoption schedule must be addressed if this accountability section is to have meaning.***

Third, the mechanism presented in this chapter for cutting off funding for new expansion projects if less than 80% of the clean air goals set out in the ERP are met in any milestone year is poorly defined and could render this section meaningless. Specifically, scenario 3 currently says that in the event less than 80% reductions are achieved, allocation of bond funding would be limited to those projects with "significant emission reduction benefits." But what does this mean? Several times during this process, various agency staff members have voiced the opinion that a freeway expansion or near-dock rail project has "significant emission reduction benefits." As you know, we disagree with that conclusion. In addition, will polluting projects that include one or two mitigation measures be defined as projects "with significant emission reduction benefits", similar to the plus (+) system that showed up and was promptly removed from the first draft Framework to grade environmental performance? If the definition is unclear and/or includes these types of projects, then the mechanism outlined for simultaneous and continuous improvements has no meaning. ***We request, instead, that funding for infrastructure projects be cut off for every project that will not result in zero additional emissions, until the ARB adopts and implements suitable additional measures that allow us to achieve the clean air goals.***

Fourth, the measurement of progress toward air quality goals should be based on emissions levels not just emissions "reductions." ***This means that the inventory must consistently be updated to reflect increases in emissions, particularly as the infrastructure system is expanded.*** As has been pointed out in previous comments about "metrics," we can, for example, achieve significant "reductions" from replacing 1,000 dirty trucks but overall air pollution will increase if expansion results in 3,000 additional trucks. Accordingly, growth factors must be accounted for in this simultaneous and continuous mechanism.

***Fifth, it is imperative that this section make clear that in each evaluation year, ARB will evaluate progress towards or compliance with every goal set forth in the ERP.*** This will ensure that the agencies can react to correct a shortfall in a timely manner. For example, if compliance with the 2020 goal of reducing PM by 85% is not evaluated until 2016, then it will be almost impossible for ARB to shift course and adopt new or additional measures that will allow us to reach that goal on time. Rather, ARB must come up with a schedule of how much progress must be made by each evaluation year for each of the goals (for example, 75% reduction of PM by 2010), evaluate the progress towards each of these goals in each evaluation year, and then ARB must immediately develop additional measures if we only reach 80-99 % of any goal (as under scenario 2) or the agencies must immediately cut off funding if we reach less than 80% of any of these goals (as under scenario 3).

In addition, corrections to a shortfall must come before the "next milestone year" under Scenario 2. As currently conceived, milestones are five years apart. Consequently, actual reductions could lag as much as 10 years behind the goals, leaving too much uncertainty for both infrastructure projects and public confidence. The compliance deadline of "2 years after" used for the final date of 2020 should be applied to all milestone dates.

***Sixth, under all of the scenarios listed, compliance should be measured against the stated ERP clean air goals, rather than "all of the emission reductions planned."*** It is unclear what the latter phrase means. The current version of the ERP, for example, fails to attain the 85% reduction in PM goal by 2020; this simultaneous and continuous mechanism cannot begin with the assumption that we will not reach the stated goals. In addition, as stated above, the ERP will not be finalized until 2007 or 2008, so we will not know until then the full extent of the "emission reductions planned."

***Seventh, as stated above, community impacts still are not addressed in any meaningful way in this draft.*** It is not enough that a project have a "community advisory committee similar to that in the I-710 process." This leaves the community with no assurance whatsoever that any mitigation will ever be adopted or implemented. In fact, none of the recommendations made by the 710 Tier II committee have been adopted for that project.

Finally, replace "if such monitoring" with "if the air district determines that sufficient monitoring" (page V-3, point 2).

## **V. SECTION VI—Funding**

***We believe user fees placed on the goods movement industry are appropriate and needed.*** The discussion of user fees (page VI-7, point 5) should endorse the concept and present its merits. If expansion is to occur, it is important that user fees, such as a container fee, be established. A significant amount and continuous stream of funds can be made available in this way, at once lessening our reliance on public debt financing and providing revenue predictability. As the goods movement industry has grown substantially, it has externalized many costs to California residents, including through its impact on communities, traffic, and public health, and through related security risks. It is economically rational and appropriate to place a fee on the industry, which is the source of pollution and infrastructure demand, and a container fee on imports targets the core element driving the demand for investment.

The goods movement industry, generally speaking, is growing and profitable, and it can bear a substantial fee. A recent elasticity study indicated that industry could bear a fee of \$95/container without compelling diversion to other ports, assuming improvements in congestion management. Port and Modal Elasticity Study by Dr. Robert Leachman for SCAG, 9-8-2005. To further lessen concerns about any competitive disadvantage among California's ports, a container fee should be implemented statewide. Importantly, we understand that the new draft of the ERP, to be released next week, will rely largely on

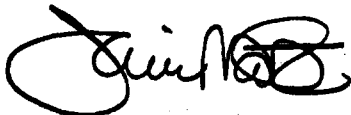
funding for truck conversion. Given the uncertain fate of the proposed bond measures it is imperative that a source of funding – such as container fees – be identified by the GMAP. Otherwise, the stated air quality improvements will never be realized.

In addition, we disagree with the statement that “federal restrictions on state regulation of some goods movement sources takes away the option of regulations in some instances.” (VI-6). As we have stated in the past, given the current state of affairs, it is imperative that our agencies regulate to the greatest extent feasible and not give in to threats of law suits from industry. For example, as we have stated in past comment letters, ARB has the ability to act in a proprietary capacity as landlord (since the state owns port lands through the Tidelands Trust Doctrine) and require that Ports require green measures through their leases and other general policies. We request that the Framework reflect the need for ARB to act in a creative, yet mandatory, way.

Finally, we reiterate our request above that the Plan make clear that the cost to eliminate public health, environmental and community impacts for ongoing expansion projects must be included in the total price for those projects and funded as a single cost.

Thank you for your attention to our comments. We look forward to continuing to work with you in an attempt to create a Goods Movement Action Plan that can in practice result in broad and significant improvements that benefit generations of California's residents.

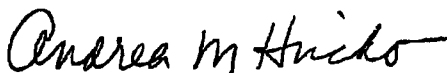
Sincerely,



Julie Masters  
Senior Attorney  
Natural Resources Defense Council



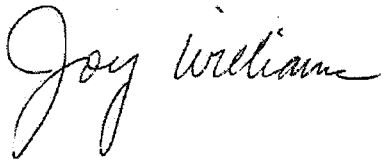
Martin Schlageter  
Campaign and Advocacy Director  
Coalition for Clean Air



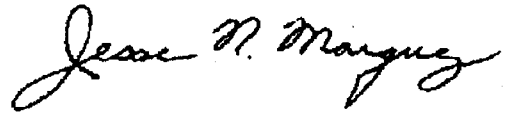
Andrea M. Hricko  
Director, Community Outreach and Education Program  
So. California Environmental Health Sciences Center  
Keck School of Medicine, USC



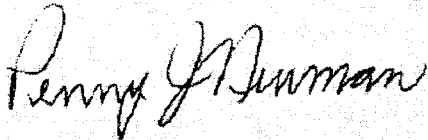
Noel Park  
President  
San Pedro & Peninsula  
Homeowners Coalition



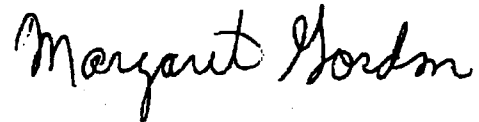
Joy Williams  
Research & Community Assistance Director  
Environmental Health Coalition



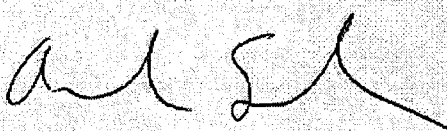
Jesse Marquez  
Executive Director  
Coalition for a Safe Environment



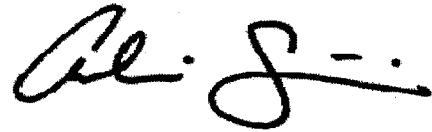
Penny J. Newman, Executive Director  
Rachel Lopez, Healthy Communities Director  
Center for Community Action and  
Environmental Justice



Margaret Gordon  
Co-Chair  
West Oakland Environmental  
Indicator Project



Andrea Samulon  
Research Associate  
Pacific Institute



Carolina Simunovic  
Environmental Health Director  
Fresno Metropolitan Ministry